

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of the

PUERTO RICO ELECTRIC POWER
AUTHORITY,

Debtor.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

Plaintiff,

v.

HON. PEDRO PIERLUISI, in his official
capacity as Governor of Puerto Rico
Defendants.

CASE NO. 17-BK-4780

Jointly Administered

PETITION UNDER TITLE III OF
THE PUERTO RICO
OVERSIGHT, MANAGEMENT
AND ECONOMIC STABILITY
ACT

Adver. Proc. Case No. 24-00062-LTS

NULLIFICATION OF ACT 10 AND
INJUNCTION BARRING
IMPLEMENTATION AND
ENFORCEMENT OF ACT 10

**URGENT MOTION TO REQUEST A SHORT EXTENSION OF TIME TO FILE REPLY
TO PLAINTIFF'S OPPOSITION TO MOTION FOR LEAVE TO INTERVENE**

TO THE HONORABLE COURT:

COMES NOW proposed intervenor Hon. José Luis Dalmau, in his official capacity as President of the Senate of Puerto Rico, through the undersigned counsels and very respectfully **SETS FORTH** and **PRAY**:

Pursuant to the current Case Briefing Schedule Order (Docket No. 9), the appearing parties' reply to plaintiff's opposition to the Senate of Puerto Rico's plea for intervention is due on the 4th September, 2024. Despite the undersigned attorney's responsible effort to complete our reply by the

current deadline, we anticipate complications in our efforts to comply with the deadline. Currently our law firm has undergone a restructuring process of its available professional legal resources which have slightly impacted our capacity to process to complete pending legal responsibilities at this moment.

While most of the parties in Title III litigation are represented by one or more large scale law firms, the undersigned attorneys' firms has a reduce legal staff. Accordingly, while we ordinarily do our best to keep pace with our much larger adversaries, these recent circumstances described briefly have created difficulties complying within the five (5) day respond period described in Case Briefing Schedule Order included in Docket No. 9. In our prior appearances in Title III proceeding, this is the first time that we have ever needed to seek an extension.

While we will continue working on our response we respectfully request a very short extension of time of up to five (5) days from the final deadline, September 4th, 2024 or up to September 9th, 2024, to file our response to the FOMB's opposition to our request for intervention. This request is not intended to unreasonably delay the proceedings and is being made in good faith, after exposing the existence of just cause.

WHEREFORE the Senate of Puerto Rico prays that this request be granted by this Honorable Court for the requested relief and grant a short extension of time of up to five (5) days from the final deadline included in the Case Briefing Schedule Order included in Docket No. 9., September 4th, 2024 or up to September 9th, 2024, to file our response to the FOMB's opposition to our request for intervention.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record, to their

registered e-mail addresses. Any non-registered attorneys and/or parties will be served via regular mail

Respectfully submitted in San Juan, PR on August 30th, 2024.

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Attorneys for intervenor, Senate of Puerto Rico and its President, Hon. Jose Luis Dalmau Santiago, in his official capacity as President of the Senate of Puerto Rico.